

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

DWAIN EDWARD THOMAS,)	
)	
Plaintiff,)	
)	
v.)	Case No. 20-cv-944-D
)	
KEVIN STITT, et al.,)	
)	
Defendants.)	

MOTION FOR LEAVE TO FILE OVERSIZED BRIEF

Plaintiff Dwain Edward Thomas, by and through his undersigned counsel, hereby moves the Court, pursuant to Federal Rules of Civil Procedure 7(b) and LCvR 7.1(e), for leave to file an oversized brief **of 70 pages** in a consolidated response to the summary judgment motions filed by Defendants Tom Bates, T. Hastings Siegfried, and Steven Harpe. In support of this motion, Plaintiff states the following:

1. Defendants Siegfried, Harpe, and Bates filed their separate motions for summary judgment on August 30, 2024 (Docs. 115, 116), and September 4, 2024, (Doc. 119).

3. Were Plaintiff to file response briefs to each of those three summary judgment motions filed by Defendants Siegfried, Harpe, and Bates, Plaintiff would be entitled to 90 total pages in response. LCvR 7.1(e).

4. Plaintiff intends to file a consolidated brief in response to those three summary judgment motions filed by Defendants Siegfried, Harpe, and Bates. Given the consolidated nature of that response brief, Plaintiff anticipates requiring a higher page limit for that brief

responding to the three summary judgment motions filed by Defendants Siegfried, Harpe, and Bates.

5. Plaintiff thus respectfully moves this Court leave to file a single oversized brief of 70 pages in response to the summary judgment motions filed by Defendants Siegfried, Harpe, and Bates, instead of filing three separate briefs that can, in total, reach 90 pages.

5. Defendants Siegfried, Harpe, and Bates object to Plaintiff's motion and "fully oppose a consolidated brief that amounts to 70 pages" because they "believe a consolidated response brief to only [those three Defendants] will grossly confuse the issues against each Defendant."

WHEREFORE, Plaintiff respectfully requests the Court to enter an order granting Plaintiff's motion for leave to file an oversized brief as described above.

Dated: September 27, 2024

Respectfully submitted,

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